

April 17, 2007

FILED/ACCEPTED  
APR 17 2007  
Federal Communications Commission  
Office of the Secretary

*BY HAND DELIVERY & ELECTRONIC FILING*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *Telenor ASA, Transferor, and Inceptum 1 AS, Transferee, Consolidated Application for Consent to Transfer of Control and Petition for Declaratory Ruling*, IB Dkt No. 06-225, FCC File Nos. ISP-PDR-20061129-00017, ITC-T/C-20061129-00529/00530/00531, ITC-T/C-20061215-00575;

*Telenor Satellite Services, Inc., Applications for Section 214 Authority*, FCC File Nos. ITC-214-20061213-00558/00559

*FTMSC US, LLC, Amendments to Applications for Section 214 Authority and for Earth Station Licenses, Requests for Special Temporary Authority, and Petition for Declaratory Ruling*, File Nos. ITC-AMD-20060804-00288, SES-AMD-20060804-01315, ITC-STA-20070301-00092, SES-STA-20070216-00243, & ISP-PDR-20060804-00010

Dear Ms. Dortch:

Inceptum 1 AS ("Inceptum"), Telenor ASA ("Telenor"), and Telenor Satellite Services, Inc. ("TSSI"), by their attorneys, hereby supplement the above-referenced applications relating to the transfer of control of Telenor Satellite Services AS ("TSS") and its indirect, wholly-owned subsidiaries (the "TSS Subsidiaries") to Inceptum and TSSI's requests for international Section 214 authority. In addition, Inceptum and MobSat S.A.S. ("MobSat") hereby supplement the record in the above-referenced proceedings to provide additional information regarding their ownership.

Dominant Carrier Treatment on the U.S.-Norway Route: Under the current ownership structure, the TSS Subsidiaries are affiliated with foreign carriers owned and controlled by Telenor. The Telenor-controlled carriers in Norway are dominant carriers. Accordingly, Telenor Satellite Inc. ("Telenor Satellite"), GMPCS Personal Communications, Inc. ("GMPCS") and Marlink, Inc. ("Marlink"), the three TSS Subsidiaries that currently hold international Section 214 authority, have agreed to dominant treatment on the U.S.-Norway route.<sup>1</sup> In addition, in its pending applications

<sup>1</sup> See *Lockheed Martin Global Telecommunications, Comsat Corp., and Comsat General Corp., Assignor, and Telenor Satellite Mobile Services, Inc. and Telenor*

for international Section 214 authority. TSSI agreed to be treated as dominant on the U.S.-Norway route.'

Upon consummation of the proposed transfer of control to Incepturn, the TSS Subsidiaries will no longer be affiliated with the Telenor-controlled foreign carriers. As a result, dominant carrier treatment of the TSS Subsidiaries on the U.S.-Norway route will no longer be appropriate. Accordingly, the parties make the following requests:

1. Incepturn requests reclassification of Telenor Satellite, GMPCS, and Marlink as non-dominant U.S. international carriers between the United States and Norway upon consummation of the Telenor-Incepturn transaction, because they will no longer be affiliated with carriers that possess market power in Norway.
2. TSSI clarifies with respect to its pending Section 214 applications that, for each application granted prior to consummation of the Telenor-Incepturn transaction, TSSI agrees to accept dominant carrier classification on the U.S.-Norway route. TSSI also clarifies that, in its pending transfer of control application (ITC-T/C-20061215-00575), it requests classification as non-dominant between the U.S. and Norway upon consummation of the transaction. Thus, to the extent the Commission grants the transfer of control application before it acts on either or both of TSSI's pending Section 214 applications, TSSI requests that it be authorized under Section 214 to operate

---

*Satellite, Inc., Assignee, Applications for Assignment of Section 214 Authorizations, Private Land Mobile Radio Licenses, Experimental Licenses, and Earth Station Licenses and Petition for Declaratory Ruling Pursuant to Section 310(b)(4) of the Communications Act, Order and Authorization, 16 FCC Rcd 22897 (2001) at ¶ 45* ("Telenor Satellite has agreed to comply with the Commission's dominant carrier regulations in its provision of service between the United States and Norway."); *Application for Consent to Transfer of Control of GMPCS Personal Communications, Inc. to Telenor Satellite Services Holdings, Inc.*, File No. ITC-T/C-20040708-00285, *Public Notice, International Authorizations Granted*, DA No. 04-2552, Report No. TEL-00823 (Aug. 19, 2004) at 4 ("Applicant agrees to be classified as a dominant carrier pursuant to Section 63.10 of the rules in its provision of U.S. international service on the U.S.-Norway route."); File No. ITC-214-20010529-00341, *Application of Telenor Satellite Mobile Services, Inc. for International Section 214 Authority, Public Notice, International Authorizations Granted*, DA No. 01-1726, Report No. TEL-00421 (July 19, 2001) at 1 ("Applicant TSMS acknowledges that it warrants classification as a dominant international carrier on the U.S.-Norway route.") and File No. ITC-ASG-20030410-00275 (*pro forma* assignment of TSMS Section 214 authorization to Marlink, Inc.).

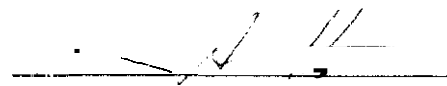
<sup>2</sup> *Telenor Satellite Services, Inc., Applications for Section 214 Authority*, File Nos. ITC-214-20061213-00558/00559, Attachment 1 at 1 ("TSSI agrees to be classified as a dominant international carrier on the US-Norway route").

as a non-dominant carrier between the U.S. and Norway upon consummation of the transaction.

Co-Investment in MobSat Group Holding Sàrl: In a letter submitted yesterday, Inceptum and MobSat advised the Commission that a U.S. entity with majority U.S. ownership, GEAM International Private Equity Fund, L.P. ("GEAM International"), has agreed to co-invest in MobSat Group Holding Sàrl ("MobSat Holding"), the ultimate parent of Inceptum and MobSat.<sup>3</sup> Inceptum and MobSat hereby confirm that the limited partners of GEAM International are passive investors. In addition, Inceptum and MobSat confirm that all the companies in the vertical ownership chain between GE International Management Incorporated (GEAM International's general partner), and its ultimate parent, the General Electric Company, are U.S.-organized entities.

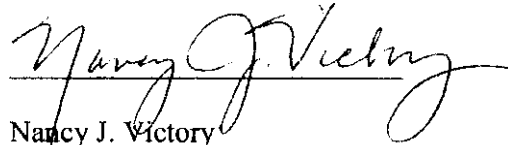
Please address any questions concerning this matter to the undersigned

Respectfully submitted,



Peter A. Rohrbach  
Karis A. Hastings  
Hogan & Hartson L.L.P.  
555 13<sup>th</sup> Street, N.W.  
Washington, D.C. 20004  
Phone: 202-637-5600  
Fax: 202-637-5910

*Counsel for Inceptum I AS and  
MobSat S.A.S.*



Nancy J. Victory  
Catherine M. Hilke  
Wiley Rein LLP  
1776 K Street NW  
Washington, D.C. 20006  
Phone: 202-719-7000  
Fax: 202-719-7049

*Counsel for Telenor ASA and  
Telenor Satellite Services, Inc.*

cc: David Krech  
Susan O'Connell  
Cara Grayer  
Counsel for Inmarsat, Inc.  
Counsel for Mobile Satellite Ventures Subsidiary LLC

<sup>3</sup> See Letter of Karis A. Hastings to Marlene H. Dortch, IB Dkt No. 06-225, dated Apr. 16, 2007.